

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION**

No. 1:21-MD-3010 (PKC)

This Motion Relates To:

INFORM INC.

Plaintiff,

-against-

**GOOGLE LLC,
ALPHABET INC., and
YOUTUBE LLC,**

Defendants.

No. 1:23-cv-01530-PKC

**DEFENDANTS GOOGLE LLC, ALPHABET INC., AND YOUTUBE LLC'S
NOTICE OF MOTION TO DISMISS
INFORM INC.'S SECOND AMENDED COMPLAINT**

FRESHFIELDS BRUCKHAUS
DERINGER US LLP
855 Main Street
Redwood City, CA 94063
Telephone: (650) 618-9250
Fax: (650) 461-8276

AXINN, VELTROP & HARKRIDER LLP
114 West 47th Street
New York, NY 10036
Telephone: (212) 728-2200
Fax: (212) 728-2201

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
One Market Plaza, Spear Tower
Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Fax: (415) 947-2099

*Counsel for Defendants Google LLC,
Alphabet Inc., and YouTube LLC*

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Google LLC, Alphabet Inc, and Youtube LLC's Motion to Dismiss Inform Inc.'s Second Amended Complaint in the above-captioned matter, which is being submitted contemporaneously with this Notice of Motion, Defendants Google LLC, Alphabet Inc., and Youtube LLC, will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order dismissing with prejudice the Second Amended Complaint, ECF No. 535, filed by Inform Inc. on the ground that Inform Inc. has failed to state a claim upon which relief can be granted. *See* Fed. R. Civ. P. 12(b)(6); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009); *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Dated: July 31, 2022

Respectfully Submitted,

/s/ Justina Sessions

Justina K. Sessions (Admitted *pro hac vice*)
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
855 Main Street
Redwood City, CA 94063
(650) 618-9250
justina.sessions@freshfields.com

Eric Mahr
700 13th Street, NW
Washington, DC 20005
(202) 777-4500
eric.mahr@freshfields.com

Mikaela Evans-Aziz (admitted *pro hac vice*)
WILSON SONSINI GOODRICH &
ROSATI
Professional Corporation
One Market Plaza, Spear Tower

Suite 3300
San Francisco, CA 94105
(415) 947-2000
mevansaziz@wsgr.com

Daniel Bitton
AXINN VELTROP & HARKRIDER LLP
114 West 47th Street
New York, NY 10036
(212) 728-2200
dbitton@axinn.com

*Counsel for Defendants Google LLC,
Alphabet Inc., and YouTube LLC*